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March 24, 2021

By ECF

The Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

*The firm continues to request to provide
the requested materials
no order
Paul A. Crotty
3/24/21*

*Re: United States v. Salvatore Tagliaferro, et al.
19 Cr. 472 (PAC)*

Dear Judge Crotty:

We represent Defendant Salvatore Tagliaferro in the above-referenced matter and write jointly with the Government to request that this Court direct the Clerk of the Court of the Southern District of New York to provide the parties with additional records related to the composition of the Petit Jury venire to be used in this case.

Disclosed with a letter dated, January 7, 2021, Ms. Rhonda Mayers-Best, Jury Administrator, provided the parties with juror information related to the jurors summoned to report for jury selection in this case on January 19, 2021. The case was thereafter adjourned to April 5, 2021. Additionally, due to the passage of time from the original production of jury composition data to the present, certain information may have changed. Accordingly, we respectfully request that this Court direct the Jury Administrator to disclose information relevant to the pool of juries now summoned to report for jury selection on April 5, 2021 in this case.

Specifically, we respectfully request the following information be provided to both parties (once available):

- (1) The Juror Number only (and not Name or Street Address) for persons selected as potential trial jurors in this case (in Spreadsheet, if possible);
- (2) The juror qualification summons forms for persons summoned to potentially become trial jurors in this case;
- (3) The Supplemental Juror Questionnaire for all persons summoned to potentially become trial jurors in this case; and
- (4) Once known, the disposition of each summoned potential trial juror in this case as to excusal, deferment, disqualification, or selection as described in the Jury Plan.

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We respectfully submit that the above information is necessary to conduct a thorough and effective evaluation of all of the areas in which Mr. Tagliaferro may have a basis to raise a fair cross-section challenge to his upcoming Petit Jury venire and for the Government to formulate its response.

As always, we thank Your Honor for his time and consideration.

Respectfully submitted,

/S/

Michael K. Bachrach
Richard H. Rosenberg
Attorneys for Defendant Salvatore Tagliaferro

cc: All parties of record (by ECF)